

Partner

55 Hudson Yards | New York, NY 10001-2163
T: +1 (212) 530-5283

[Schwartz@milbank.com | milbank.com

August 8, 2023

VIA ECF

Hon. Paul A. Engelmayer United States District Court Southern District of New York 40 Foley Square, Courtroom 1305 New York, New York 10007

Re: Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Limited, et al., No. 1:22-cv-02943 (PAE) (S.D.N.Y.)

Dear Judge Engelmayer:

We represent Defendants in the above-captioned action, and write with the permission of Plaintiff. Pursuant to the Court's August 3, 2023 Order, the Parties are required to submit a proposed joint order premised on the Court's approval of a guaranty at the conference scheduled for August 10. The Parties have exchanged drafts of such proposed orders, but have not yet agreed on the form of an order. Plaintiff's proposal is attached as Exhibit A to this letter, and Defendants' proposal is attached as Exhibit B to this letter.

The Parties intend to have further discussions on this topic in advance of the August 10 hearing.

Respectfully submitted,

/s/ Jed M. Schwartz

Jed M. Schwartz

cc: All Counsel of record (via ECF)